My name is Tom Lane. I am a Farm Service Agency (FSA)employee, a farm person and citizen interested in achieving the most cost effective animal identification plan for livestock producers and the meat consumer. After reviewing the draft national plan, I would like to offer these thoughts.

As I understand the plan, it assigns responsibility for the id plan to the Animal, Plant Health Inspection Service (APHIS) and calls for hiring additional APHIS staff to develop, implement and maintain the identification system. This would include such things as premise registration, identifying the type of livestock, the number and age of animals, a system for tracking the movement of animals, creating a point of access for livestock producers to input all this data into the identification system and any other information that the identification plan would determine appropriate.

If we assume a government agency is the best "person" to facilitate the implementation of the plan and maintain the identification system, I would submit that FSA would be a logical partner for APHIS and the American livestock producer in this process.

FSA has a presence in almost every agricultural county/parish in this nation, with staff in those offices that are already available to help develop, implement and maintain an identification system. This would help alleviate resource and staffing constraints until a careful analysis of needs can be completed. I believe that because FSA already has a presence nationwide, this would keep costs down. Additionally, most livestock producers are familiar with the FSA and are comfortable with the staffs, making it an excellent contact point for the livestock producer to enroll in the id system.

Further, FSA has other assets to offer. FSA maintains the most complete name and address data base for livestock producers. This will be extremely beneficial when it comes to outreach and training. In addition, FSA offers GIS capabilities. As FSA office's become GIS certified, it will be easy to add a layer of data to identify each livestock operation, their map location, type of livestock, number of animals, or any other information that is identified in the plan. Through the GIS, premise registration and any annual test exercises can be more easily managed.

USDA's eGov initiative will provide livestock producers with the opportunity to use that system to register and maintain their data if they so desire.

In conclusion, I believe that utilizing the FSA to implement and maintain an id system is both livestock producer friendly and fiscally responsible to the American taxpayer. Because of the existing FSA network, cost savings are demonstrated immediately. No need to rent office space, equip that office space or hire additional staff until actual needs can be determined.

Thank you for the opportunity to share my thoughts.